

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DISTRICT**

UNITED STATES OF AMERICA

PLAINTIFF

VS.

CIVIL ACTION NO. 3:16-CV-00489-WHB-JCG

HINDS COUNTY, ET AL.

DEFENDANTS

MOTION FOR STATUS CONFERENCE

COMES NOW Hinds County, Mississippi, by and through counsel of record, and pursuant to the Federal Rules of Civil Procedure and other applicable authority, files its Motion for Status Conference, and would state unto this Honorable Court the following:

1. On June 12, 2020 the Hinds County Circuit Court, *sua sponte*, entered an Order directing a Juvenile Charged as an Adult (hereinafter “JCA”) to be transferred from the Henley-Young Youth Detention Facility to the Raymond Adult Detention Facility (hereinafter “RDC”). The basis for this transfer was due to the numerous attempts of self-harm exhibited by the JCA. The Circuit Court opined that the minor would be better served by the mental health services at the Raymond Adult Detention Facility.

2. Pursuant to the Consent Decree in the instant matter before this Court, the County must ensure that all youth are properly separated by sight and sound from adult prisoners. In order to meet compliance with the Consent Decree, the County determined that the most appropriate housing of any Juvenile Charged as an Adult is at the Henley-Young Youth Detention Facility due to the available programming space, separation from the adult detainees, and the accessibility to education and other

treatment consistent with federal law.

3. On June 16, 2021, the Sheriff's Office filed an Emergency Motion to Transfer the Juvenile from Raymond Detention Center to the Henley-Young Youth Detention Center, asserting that the youth facility is a better location for the JCA due to the access to programming and socializing.

4. On June 21, 2021, the Hinds County Circuit Court entered an Order denying the Sheriff's motion.

5. To date, the JCA has been house in medical isolation at the Raymond Adult Detention facility, in violation of the Consent Decree.

6. The County respectfully requests a Status Conference with this Court to discuss the implications of housing the JCA in the adult facility.

7. Due to the relative simplistic nature of this motion, the County requests that this Court waive the requirement so submitting a supporting memorandum brief pursuant to L.U.Civ.R. 7(b)(4).

Respectfully submitted this the 30th of June, 2021.

/s/Claire Barker
CLAIRE BARKER, MSB # 101312

/s/ Tony Gaylor
TONY GAYLOR, MSB # 10189

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CERTIFICATE OF SERVICE

The undersigned certifies that he has this day electronically filed the foregoing document with the Clerk of the Court using the Court's electronic filing system (ECF), which sent notification of such filing to all attorneys of record.

Respectfully submitted this the 30th day of June, 2021.

/s/Claire Barker
CLAIRE BARKER, MSB # 101312

/s/ Tony Gaylor
TONY GAYLOR, MSB # 10189